

EXHIBIT "D"

BV Files ~ James McGibney is a complete fraud, and here is
why...



Bullyville
@BullyVille

Blocked

I don't get nearly enough credit for managing not to be a violent psychopath.

Reply Retweet Favorite More

1,538 RETWEETS	148 FAVORITES	
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11:07 AM - 22 Jul 2013

06 Friday Apr 2018

Texas Nazi' Attorney Jason Van Dyke Is Also A Pedophile – Court Records Claim!!

POSTED BY BV FILES IN Uncategorized

≈ 309 COMMENTS

[Tweet](#)

Tags

@popehat, anti-SLAPP,
attorney Jason Van Dyke,
attorney Ken White, BV Files,
Jason Lee Van Dyke, JLVD,
Pope Hat blog, Stephen Tyler
Victoria County, The Proud
Boys, The Van Dyke Law Firm
PLLC, Thomas Retzlaff



— Absolutely incompetent – DO NOT HIRE THIS MAN!!

**DO WE HERE AT THE BV FILES GIVE TWO SHITS ABOUT RESTRAINING ORDERS FROM
SMALL TOWN JUDGES WAY FAR AWAY?**

NO! WE DO NOT – 100% VERIFIED!!

**THUS WE WILL CONTINUE TO TALK ABOUT VAN DYKE AS MUCH AS WE WANT TO, AS
WELL AS CONDUCTING A PUBLIC AWARENESS CAMPAIGN AIMED AT INFORMING THE
PUBLIC THAT THIS IS A BAD MAN.**



April 6, 2018 –

Jason Van Dyke makes a public statement about lawsuits:

West is the Best 09



We here at the *BV Files* have a very special message for Denton, TX attorney Jason Lee Van Dyke:



— Go Fuck Yourself, Jason Van Dyke. Woof, bitch!!

FILED
 DENTON COUNTY, TEXAS
 18-2793-431 2018 MAR 29 AM 10:45
 CLERK'S OFFICE
 431st JUDICIAL DISTRICT

CAUSE NO. <u>18-2793-431</u> JASON LEE VAN DYKE Plaintiff, v. THOMAS CHRISTOPHER RETZLAFF a/k/a Dean Anderson d/b/a ViaView Files LLC, BV Files, and ViaView Files Defendant.	§ § § §	IN THE DISTRICT COURT 431st JUDICIAL DISTRICT DENTON COUNTY, TEXAS
--	------------------	--

TEMPORARY RESTRAINING ORDER
& ORDER SETTING HEARING FOR PRELIMINARY INJUNCTION

1. After considering the application of Jason Lee Van Dyke for temporary restraining order, the pleadings, the affidavits, and arguments of counsel, the Court finds there is evidence that harm is imminent to plaintiffs, and if the Court does not issue the temporary restraining order, plaintiffs will be irreparably injured by the conduct of Thomas Christopher Retzlaff.

2. An *ex parte* order, without notice to Thomas Christopher Retzlaff is necessary because there was not enough time to give notice to defendant, hold a hearing, and issue a restraining order before additional irreparable injury, loss, or damage would occur to plaintiffs and public safety may be jeopardized by doing so.

3. Therefore, by this order, the Court hereby restrains Thomas Christopher Retzlaff from

- (a) having further contact of any kind with Jason Lee Van Dyke, unless Thomas Christopher Retzlaff represents himself as a *pro se*, and in that case, only to the minimum extent necessary to comply with the Texas Rules of Civil Procedure;
- (b) having any contact with any employer of Jason Lee Van Dyke;
- (c) having any contact with any potential employer of Jason Lee Van Dyke;
- (d) having any contact with any

TEMPORARY RESTRAINING ORDER

Page 1 of 2

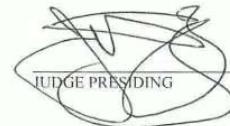
past, current, or future client of Jason Lee Van Dyke; ~~and (e) making any further publications on the Internet or elsewhere, which relate or pertain to Jason Lee Van Dyke in any way.~~ This order shall not be construed in such a way as to prohibit Thomas Christopher Retzlaff from participating in the discovery process in this or any other case, and furthermore, shall not be construed in such a way as to prohibit Thomas Christopher Retzlaff from filing or assisting the Office of the Chief Disciplinary Counsel of the State Bar of Texas with any grievance concerning Jason Lee Van Dyke.

4. The Clerk is ordered to issue notice to Thomas Christopher Retzlaff, that the hearing on Plaintiffs' application for temporary injunction is set for April 11, 2018, at 1:30 ~~am~~/p.m. The purpose of the hearing shall be to determine whether this temporary restraining order should be made a temporary injunction pending a full trial on the merits.

6. Bond is set at \$100.00

This order expires on April 12, 2018 at 10:29 o'clock ~~A~~ m.

SIGNED on March 29, 2018 at 10:29 o'clock ~~A~~ M.



JUDGE PRESIDING

TEMPORARY RESTRAINING ORDER

Page 2 of 2

Unfortunately for Van Dyke and his pet judge, the Honorable (not so honorable) Jonathan Bailey, Thomas Retzlaff has absolutely **NOTHING** to do with the administration of this blog or the content that appears herein. While we here at the *BV Files* do like Retzlaff (along with Neal Rauhauser, Lane Lipton, Lora Lusher, *Miss Anon News*, Jennifer D'Allesandro, and Jane Does 1 – 5), that does not mean that we give them the keys to the car every time one of us, your Admins of the *BV Files*, decides to get drunk or partake in his (or her) "medical" marijuana!!



Denton, Texas, attorney Jason Lee Van Dyke, in addition to being a Nazi drug addict, is clearly a mentally retarded person. But don't take our word for it...

 **Orcrist - Paperwork Cleaver** Follow ▼
@orcrist86

Replies to @khalil_spencer @Bagchi and 2 others

ooooh boy, are you in for a treat. so JLVD has a history of threatening people with violence and attempting to intimidate others. I'll let other find you the links, but suffice it to say you are about to go down a rabbit hole of racism and fuckery

9:44 AM - 15 Nov 2017

WE REPORT, YOU DECIDE!!

FILED: 3/28/2018 11:55 AM
 SHERRI ADELSTEIN
 Denton County District Clerk
 By: Alex Tuttle, Deputy

CAUSE NO. 18-2793-431

JASON LEE VAN DYKE Plaintiff,	§	IN THE DISTRICT COURT
v.	§	§ JUDICIAL DISTRICT
THOMAS CHRISTOPHER RETZLAFF a/k/a Dean Anderson d/b/a BV Files, ViaView Files L.L.C., and ViaView Files Defendant.	§	§ DENTON COUNTY, TEXAS

**PLAINTIFF'S VERIFIED ORIGINAL PETITION AND
APPLICATION FOR TEMPORARY RESTRAINING ORDER**

I. DISCOVERY CONTROL PLAN AND LOCAL RULE DISCLOSURE

1.1 Discovery in this case is intended to be conducted under level 2 of rule 190 of the Texas Rules of Civil Procedure. Plaintiff seeks damages in the amount of one million dollars or more.

II. PARTIES

2.1 Plaintiff, Jason Lee Van Dyke, ("Van Dyke"), an individual, is a resident of Denton County, Texas whose address is 108 Durango Drive, Crossroads, TX 76227.

2.2 Defendant, Thomas Christopher Retzlaff a/k/a Dean Anderson d/b/a ViaView Files LLC, BV Files, and ViaView Files ("Retzlaff"), an individual, may be served with process at PO Box 46424, Phoenix AZ 85063

2.3 Subject matter jurisdiction is appropriate in this Court because Plaintiff seeks damages within the jurisdictional limits of this Court. Personal jurisdiction over the Defendant is appropriate in this Court because Defendant has committed numerous tortious acts against a resident of this state. It should further be noted that Defendant has voluntarily litigated in this state in multiple separate occasions and has previously been declared a vexatious litigant in this state.

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 1 of 45

2.4 Venue in this state is mandatory in Denton County, Texas pursuant to Tex. Civ. Prac. & Rem. Code § 15.016 because Plaintiff resided in Denton County on the date that his causes of action for defamation and for invasion of privacy accrued.

III. FACTS

3.1 Van Dyke is an attorney licensed to practice law in the State of Texas who represents both individuals and small-to-medium sized businesses in a variety of matters which include, but are not limited to, criminal defense, civil litigation, family law, and consumer law. He was, until March 28, 2018, employed by Karlseng, LeBlanc & Rich L.L.C. ("KLR") for the purpose of investigating claims and litigating cases on behalf of Maverick Title of Texas L.L.C. d/b/a Texas Title ("Texas Title").

3.2 Retzlaff is a convicted felon and a vexatious litigant. A copy of the order declaring Retzlaff a vexatious litigant is attached hereto as Exhibit "A" and incorporated by reference herein. A copy of Retzlaff's criminal history in Texas is attached hereto as Exhibit "B" and incorporated by reference herein.

3.3 On or around December 20, 2017, Retzlaff filed a frivolous grievance against Plaintiff with the State Bar of Texas in which he made the following claim:

"Earlier this year I found out that he had gotten a job as an Assistant District Attorney for Victoria County, Texas, in charge of felony prosecutions. So I contacted Steve Tyler, the District Attorney (who I know because I live in San Antonio) and said "Do not hire this dude - he is a fucking lunatic." I then pointed out that I am convinced that Van Dyke is a drug addict who suffers from a very profound mental illegal that looks to be untreated and he regularly gets into "flame wars" and disputes with random people on the internet. I pointed out that

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 2 of 45

Texas Nazi Attorney Jason Van Dyke is Also a Pedophile - Court Records Claim BV Files

Van Dyke is likely posting on Storm Front (a white nationalist website) as the user "WNLaw". Van Dyke has since been posting online that he is going to murder me because I am the one who cost him his job with Victoria County. He further threatens to murder my family, and many others. Unfortunately for Van Dyke, he has come up against a person who simply cannot be intimidated. You all need to disbar this retard ASAP. On March 24, 2017, Van Dyke filed a Rule 202 Pre-suit Discover petition in the 377th District Court in Victoria County trying to uncover the reasons why he lost that job at the District Attorney's office. On June 16, 2017, the petition was denied when the judge ruling against Van Dyke pouted him out of court for being an idiot for filing such a thing to begin with. Van Dyke's legal action was clearly in retaliation for my exercising my First Amendment rights and was in violation of the Texas Citizens Participation Act.

See *In re Chris Elliott*, 504 S.W.3d 455 (tex.App. - Austin 2016, no pet.)¹⁴

Plaintiff is not suing Defendant for the act of filing the grievance. However, he is suing Defendant in part for the allegations made by him in the grievance and for tortious conduct that he has committed against Plaintiff since the filing of the grievance. The facts and circumstances surrounding the grievance also demonstrate that Defendant controls a website that has been responsible for tortious conduct against Van Dyke.

3.4 The grievance referenced in paragraph 3.3 above was initially dismissed by the State Bar of Texas as an inquiry. Defendant appealed this decision to the Board of Disciplinary Appeals (BODA), which reversed this determination on or around March 1, 2018. On or around the same date, the website known as "BV Files", which can be located at www.viaviewfiles.net (referred to herein as "BV Files", posted a copy of the letter sent to

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 3 of 45

Defendant from BODA. As matters of this nature before the State Bar of Texas and BODA are confidential, it stands to reason that the person responsible for the content of BV Files is, in fact, Defendant. A true and correct copy of the relevant excepts from

3.5 On March 25, 2018, Retzlaff made the following statements of fact concerning Van Dyke on his website at the following link (<http://www.viaviewfiles.net/tag/jason-van-dyke/>):

- (a) Van Dyke is a Nazi;
- (b) Van Dyke is a white supremacist;
- (c) Van Dyke has a criminal record for abusing women; and
- (d) Van Dyke has committed professional misconduct against him (Retzlaff).

He also posted pictures of the principals of KLR and Texas Title, referring specifically to Robert Karlseng as a "Nazi Paymaster". He also posted the address of Van Dyke's employer. A true and correct copy of the relevant except from this post is attached hereto as Exhibit "D" and incorporated by reference herein.

3.6 In addition to the foregoing, Plaintiff learned that Retzlaff sent numerous e-mail messages to Robert Karlseng and Claude Rich. In one e-mail communication he wrote:

"I thought that I would contact management before I go to Facebook and Twitter and blast this out all over the world. This guy has been working for you for a very long time and I am shocked that nothing has been done." In the same e-mail string, Retzlaff threatened to contact every judge and opposing counsel in every case that Van Dyke is currently involved in."

It should be noted that, in these communications, Retzlaff used the name "Dean Anderson" in an apparent attempt to mask his tortious conduct against Van Dyke. In these messages, Defendant stated that he would be calling all of Van Dyke's clients, the

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 4 of 45

opposing counsel in all of his cases, and the judges in all of his cases. Similar threats were made to Plaintiff in the electronic communications attached hereto as Exhibit "E" and Exhibit "F" and incorporated by reference herein.

3.7 On March 27, 2018, Plaintiff was informed that he was being terminated from his employment with KLR due to the postings made by Defendant. But for the harassment of KLR and its principals by Defendant, Plaintiff would not have lost his job.

IV. CAUSES OF ACTION

4.1 Plaintiff incorporates paragraphs 1.1 – 3.7 above into each cause of action below by reference.

(Libel Per Se)

4.2 Defendant published the statements of fact concerning Plaintiff referenced in paragraph 3.5 and 3.6 above, and in an electronic communication to Plaintiff's employer.

4.3 The statements were false and defamatory.

4.4 With regard to making the statements, the Defendant was acting with actual malice.

4.5 Damages are presumed in favor of Plaintiff and against Defendant because he made statements which tended to (a) injure Van Dyke in his office, profession, or occupation; and (b) falsely charges Van Dyke with the commission of a crime. *Leyendecker & Assocs. v. Wechter*, 683 S.W.2d 369, 374 (Tex. 1984). Nevertheless, Plaintiff has suffered actual monetary loss due to the loss of his employment as a result of Defendant's conduct.

4.6 Plaintiff specifically alleges that he can prove his claim against Defendant by clear and convincing evidence, including actual malice, and that he is entitled to recover of exemplary damages on his claim for libel per se.

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 5 of 45

(Intrusion on Seclusion)

4.7 Retzlaff intentionally intruded on Van Dyke's solitude, seclusion or private affairs. While this tort has always included physical intrusions, it has also included non-physical intrusions such as following, spying-on, or harassing a plaintiff. *Kramer v. Downey*, 680 S.W.2d 524, 525 (Tex. App. – Dallas 1984, writ ref'd n.r.e).

4.8 This type of intrusion into ones private affairs (repeated demands to plaintiff's boss with the clear intent that Van Dyke's employment be terminated) would be highly offensive to a reasonable person. *Household Credit Servs. v. Driscol*, 989 S.W.2d 72, 84-85 (Tex. App. – El Paso 1998, pet. denied); *Donnel v. Lara*, 703 S.W.2d 257, 259 (Tex. App. – San Antonio 1985, writ ref'd n.r.e).

4.9 Van Dyke has suffered injury as a result of Retzlaff's intrusion. In this case, Van Dyke has suffered the complete loss of his employment and severe emotion distress concerning that loss of employment. He has also suffered emotional distress due to the ongoing and continuing harassment by Retzlaff.

(Tortious Interference With Contract – Victoria County)

4.10 Plaintiff had an existing contract with the Victoria County District Attorney for employment as a felony prosecutor, which he had been scheduled to begin on April 3, 2017 at a salary of \$63,600.00 plus other employment benefits.

4.11 Through the actions to which Defendant has freely admitted, and which is recited in paragraph 3.3 above, Defendant willfully and intentionally interfered with the contract between Plaintiff and Victoria County.

4.12 Defendant's interference with the contract was the proximate cause of Plaintiff's injury, to wit, the loss of his employment, as well as earnest money he had placed a house

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 6 of 45

located at 110 Teakwood in Victoria, Texas and severe damage to his professional reputation.

4.13 Plaintiff specifically alleges that he can prove his claim against Defendant by clear and convincing evidence, including actual malice, and that he is entitled to recover of exemplary damages on his claim for tortious interference

(Tortious Interference With Contract – KLR)

4.14 Plaintiff had an existing contract with KLR for employment. To wit, Plaintiff was employed as an associate attorney with KLR for a salary of sixty thousand dollars (\$60,000) per year, plus health and other employment benefits.

4.15 Through the actions outlined in paragraphs 1.1 – 3.7 above, Defendant willfully and intentionally interfered with the contract between Plaintiff and KLR.

4.16 Defendant's interference with the contract was the proximate cause of Plaintiff's injury, to wit, the loss of his employment.

4.17 Plaintiff specifically alleges that he can prove his claim against Defendant by clear and convincing evidence, including actual malice, and that he is entitled to recover of exemplary damages on his claim for tortious interference.

(Intentional Infliction of Emotional Distress)

4.18 The conduct of Defendant as alleged in paragraphs 1.1 – 3.7 above was intentional, extreme, and so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.

4.19 Defendant's conduct has caused Plaintiff severe emotional distress due to the loss of his job and ongoing harassment by Defendant.

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 7 of 45

**V. APPLICATION FOR TEMPORARY RESTRAINING ORDER AND
INJUNCTIVE RELIEF**

5.1 Plaintiff reincorporates the allegations contained in paragraphs 1.1 –4.19 above.

(Temporary Restraining Order)

5.2 Pursuant to Tex. R. Civ. P. 680, Plaintiff requests that a temporary restraining orders be entered against Defendant. An affidavit in support of the temporary restraining order is attached hereto as Exhibit "F" and incorporated by reference herein.

5.3 The evidence contained in the affidavit demonstrates that Defendant has harassed Plaintiff in an extreme and outrageous matter, that he has caused Plaintiff to lose his job, and that he is likely to interfere with Plaintiff's clients and other possible means of employment. He has expressly stated that he intends to destroy Plaintiff's career and continue this conduct into the foreseeable future.

5.4 Defendant is well known to Texas courts, to the Texas legal community, and to the public at large for engaging in this type of behavior. In fact, he has engaged in similar conduct toward attorneys in this county (Evan Stone) in the past. Plaintiff has already suffered irreparable injury and damage. Defendant also represents an imminent threat to continued immediate and irreparable injury, loss, or damage due to his threats to continue harassing Plaintiff and contacting his clients.

5.5 Plaintiff has a substantial likelihood of success on their claims. The evidence attached to this petition could not possibly be more damning and the conduct committed by Defendant is extreme and outrageous to such an extent that it is nearly without precedent. Injunctive relief is Plaintiff's sole remedy to stop continuing damage to his livelihood and reputation.

5.6 Texas courts have held that injunctive relief is appropriate in cases when restraining the

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 8 of 45

publication of a defamatory statement is essential to avoid impending danger or to protect a business or other property interest that is threatened by intimidation or coercion.

Kinney v. Barnes, 443 S.W.3d 87, 99 (Tex. 2014) (permitting injunctive relief in a defamation case to avoid impending danger); *Ex parte Tucker*, 220 S.W.75, 76 (Tex. 1920) (permitting injunctive relief to protect against intimidation or coercion). A constant barrage of false and defamatory statements directed toward an individual's employer and his clients is not protected by the First Amendment; it is tortious conduct that this Court clearly has the power to prohibit. Such a prohibition is especially appropriate in this case, where Defendant has managed to cause extreme harm to Plaintiff in a very short period of time.

5.7 The relief which Plaintiff immediately requests from this Court is that Defendant be enjoined and restrained from:

- (a) having further contact of any kind with Plaintiff, unless Defendant represents himself as a *pro se*, and in that case, only to the minimum extent necessary to comply with the Texas Rules of Civil Procedure.
- (b) having any contact with any employer of Plaintiff;
- (c) having any contact with any potential employer of Plaintiff;
- (d) having any contact with any past, current, or future client of Plaintiff;
- (e) making any further publication, on the Internet or elsewhere, which relate or pertain to Plaintiff in any way;

5.8 Plaintiff asks that the Court set bond at no more than \$100.00. This bond is reasonable in light of the fact that Plaintiff just lost his job due to Defendant's wrongful conduct and is currently making only \$24,000.00 per year at what used to be his second job.

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 9 of 45

(Temporary Injunction)

5.9 Pursuant to Tex. R. Civ. P. 681-84, Plaintiff requests that Defendant be cited to appear, and following such a hearing, for the Court to enter a temporary injunction enjoining and restraining the conduct referenced in paragraph 5.7 above.

5.10 Plaintiff requests that the temporary injunctive relief under paragraph 5.7 begin to run at the time this Court signs a temporary restraining order (or temporary injunction) and terminate at the conclusion of this lawsuit's trial.

5.11 Plaintiff asks that the Court set bond at no more than \$100.00.

(Permanent Injunction)

5.12 At the conclusion of trial, Van Dyke requests that any injunction entered as requested in paragraphs 5.1 – 5.11 above be made permanent. Plaintiff also requests that Defendant be ordered to remove any and all content that he has published concerning Plaintiff that is adjudged to be defamatory. *Kinney*, 443 S.W.3d at 93.

VI. PRAYER

6.1 Plaintiff prays that—

- a. Defendant be cited to appear and answer;
- b. Plaintiff be awarded actual damages against Defendant that were incurred as a result of his wrongful conduct including, but not limited to, damages for mental anguish, loss to personal reputation, loss to professional reputation, and loss of business, in the amount of at least thirty million dollars (\$30,000,000.00);
- d. Plaintiff be awarded exemplary damages against Defendant in the amount of at least seventy million dollars (\$70,000,000.00);
- e. Plaintiff be granted a temporary restraining order for the relief requested in paragraphs 5.7 until a hearing on the issue can be held;
- f. That upon such hearing on the request for injunctive relief set forth above, that this Court will order, restrain, and enjoin Defendant as plead in

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 10 of 45

paragraphs 5.7 and 5.9 – 5.11 above;

- g. Plaintiffs be granted permanent injunctive relief against Defendant;
- h. Plaintiffs be granted judgment for all costs of court; and
- i. Plaintiffs be granted all further relief to which it may be entitled.

Respectfully submitted,

/s/ Jason Lee Van Dyke
Jason L. Van Dyke
State Bar No. 24057426
108 Durango Drive
Crossroads, TX 76227
P – (469) 964-5346
F – (972) 421-1830
Email: jason@vandykelawfirm.com

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 2.1.3

I certify that, to the best of my knowledge, the party against whom relief is sought ex parte is not represented by counsel in the matter made the basis of the relief sought. Upon investigating this case, I came to believe that Retzlaff was represented by Jeffrey Dorrell of Hanszen LaPorte. I spoke with Mr. Dorrell prior to filing this lawsuit and he stated to me that he does not represent Mr. Retzlaff. Accordingly, Retzlaff is not, to the best of my knowledge, represented by counsel.

/s/ Jason Lee Van Dyke
JASON L.VAN DYKE

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 11 of 45

Here is a PDF of the petition in case you wish to easily download it.

CLICK ON THE IMAGE TO VIEW ON YOUR MOBILE DEVICE

FILED: 3/28/2018 11:55 AM
 SHERRI ADELSTEIN
 Denton County District Clerk
 By: Alex Tuttle, Deputy

CAUSE NO. 18-2793-431

JASON LEE VAN DYKE
 Plaintiff,
 v.
 THOMAS CHRISTOPHER RETZLAFF a/k/a
 Dean Anderson d/b/a BV Files, ViaView Files
 L.L.C., and ViaView Files
 Defendant.

IN THE DISTRICT COURT
 JUDICIAL DISTRICT
 DENTON COUNTY, TEXAS

PLAINTIFF'S VERIFIED ORIGINAL PETITION AND
 APPLICATION FOR TEMPORARY RESTRAINING ORDER

I. DISCOVERY CONTROL PLAN AND LOCAL RULE DISCLOSURE

1.1 Discovery in this case is intended to be conducted under level 2 of rule 190 of the Texas Rules of Civil Procedure. Plaintiff seeks damages in the amount of one million dollars or more.

II. PARTIES

2.1 Plaintiff, Jason Lee Van Dyke, ("Van Dyke"), an individual, is a resident of Denton County, Texas whose address is 108 Durango Drive, Crossroads, TX 76227.

2.2 Defendant, Thomas Christopher Retzlaff a/k/a Dean Anderson d/b/a ViaView Files LLC, BV Files, and ViaView Files ("Retzlaff"), an individual, may be served with process at PO Box 46424, Phoenix AZ 85063

2.3 Subject matter jurisdiction is appropriate in this Court because Plaintiff seeks damages within the jurisdictional limits of this Court. Personal jurisdiction over the Defendant is appropriate in this Court because Defendant has committed numerous tortious acts against a resident of this state. It should further be noted that Defendant has voluntarily litigated in this state in multiple separate occasions and has previously been declared a vexatious litigant in this state.

ORIGINAL PETITION AND APPLICATION FOR TRO

Page 1 of 45



— Van Dyke Facebook post – April 20 2017

A concerned citizen states:



Herbert George Wells
@HerbertGeorgeW

Replies to @AsherLangton

Someone has taken away JLVD's guns, right?
Because I'm pretty sure he's fucking stupid
enough to use them.

6:44 AM - 18 Nov 2017

6 Likes

1 reply

6

JASON VAN DYKE CLAIMS THAT HE IS NOT A NAZI / WHITE SUPREMACIST, RIGHT?



What a pussy

The photo on the left comes from the Facebook group associated with The Proud Boys.



— An Antifa poster

Take note of whose photograph is on the top, left hand side!



- <https://www.facebook.com/TheVanDykeLawFirmPLLC/photos/rpp.282699505561340/309100342921?type=3&theater>

Van Dyke boasts on his law firm's Facebook page that he is the Sergeant at Arms for the Dallas Chapter of The Proud Boys – designated white supremacist organization by the Southern Poverty Law Center. <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>

Yes, you read correctly – Van Dyke is filing a \$100 million LOLsuit against Retzlaff. Good thing for him he has a rich family with all of his money tied up in an overseas trust.



- Head Office location for RTC Holding Company, LLC PO Box 141 Rarotonga, Cook Islands (this is no BS, either!)

Yeah, so good luck in trying to get your money, dumb ass.

Here are five minutes worth of Van Dyke's 'greatest hits'. **CHECK IT OUT!!**

JLVD - Great Orator or The Greatest Orator?



Tonya Harlan
Regional Counsel Dallas at State Bar of Texas
Dallas/Fort Worth Area | Law Practice

79
connections

Current State Bar of Texas
Previous Tarrant County District Attorney's Office
Education Baylor University School of Law

The State Bar of Texas has decided to initiate disbarment proceedings against Van Dyke, with a petition soon to be filed in Denton County District Court. The case is being prosecuted by Tonya Harlan, Dallas Regional Counsel – Office of the Chief Disciplinary Counsel, State Bar of Texas.

Rule 4.04. Respect for Rights of Third Persons

(a) In representing a client, a lawyer shall not use means that have no substantial purpose other than to embarrass, delay, or burden a third person, or use methods of obtaining evidence that violate the legal rights of such a person.

(b) A lawyer shall not present, participate in presenting, or threaten to present:

(1) criminal or disciplinary charges solely to gain an advantage in a civil matter; or

(2) civil, criminal or disciplinary charges against a complainant, a witness, or a potential witness in a bar disciplinary proceeding solely to prevent participation by the complainant, witness or potential witness therein.

.....

Rule 8.04. Misconduct

(a) A lawyer shall not:

(1) violate these rules, knowingly assist or induce another to do so, or do so through the acts of another, whether or not such violation occurred in the course of a client-lawyer relationship;

(2) commit a serious crime or commit any other criminal act that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects;

(3) engage in conduct involving dishonesty, fraud, deceit or misrepresentation;

(4) engage in conduct constituting obstruction of justice;

(5) state or imply an ability to influence improperly a government agency or official;

(6) knowingly assist a judge or judicial officer in conduct that is a violation of applicable rules of judicial conduct or other law;

(7) violate any disciplinary or disability order or judgment

So how does Van Dyke respond?? **CHECK IT OUT!!**



J.L. Van Dyke. @jasonleevandyke

4 minutes

...

No longer welcome where I've trained for years. This is the final straw. Langton, White, Kweli, HuffPo - they are all getting sued first thing Monday morning. This ends now. They can disbar me if they want, I don't give a damn. If they sanction me, my property is defended with a 50 BMG.

▲ 0

Reply

Repost

Quote

<https://gab.ai/jasonleevandyke>

Interim Suspension

If the Chief Disciplinary Counsel determines during the course of investigating a Complaint that one or more grounds exist to support seeking an interim suspension of the respondent's law license, the CDC can seek authority from the Commission to pursue an interim suspension.

If such authority is given, a petition is filed in a district court of proper venue, service is obtained on the respondent, and the court is to set a hearing within 10 days. The court may suspend the attorney pending final disposition of the disciplinary action if the court finds by a preponderance of the evidence that the respondent poses a substantial threat of irreparable harm to clients or prospective clients. Any of the following elements conclusively establishes such a substantial threat of irreparable harm:

- Conduct that includes all elements of a serious crime (as that term is defined in the disciplinary rules); or
- Three or more acts of professional misconduct as defined in the rules, whether or not there is harm; or
- Any other conduct that, if continued, will probably cause harm to clients or prospective clients.

As documented in recent court filings, Van Dyke has repeatedly threatened to murder opposing counsel and opposing parties.

How much longer do you think it will be until the State Bar's initiates a proceeding to suspend Van Dyke's law license?



So how many active clients does Van Dyke have left?

- Paul Nguyen
- Chris David Roberts
- Langbert Financial, Inc
- Christine Scallian
- Texas Title Company / Maverick Title of Texas

Thanks to the modern miracle of electronic filing, we, your Admins of the *BV Files*, can quickly and easily monitor the Texas e-Filing system and the federal PACER system for any sign that Van Dyke has been hired. Should that happen, we will (of course) make contact with these clients.

FUN FACT: Just a few months ago, Van Dyke applied for admission to the Alaska State Bar. That application was REJECTED!

And here is Van Dyke stalking an opposing party to a lawsuit he filed:

Help Me Serve "Taliban" Talib Kweli Greene



This seems police worthy



j.l.vandyke @bayousbest - Not as mad at Talib is going to be when I personally skin him and have his hide put on display on my living room.



9m Reply

8:27 AM - 18 Nov 2017

24 Retweets 83 Likes



12 24 83

As promised, here is the full article that was published today in Texas Lawyer magazine, which is read daily by each and everyone who is a member of the State Bar of Texas.

FUN FACT: Texas lawyer magazine is owned and published by ALM. ALM (formerly American Lawyer Media) is a media company located in New York City, and is a provider of specialized business news and information, focused primarily on the legal, insurance, and commercial real estate sectors. ALM owns and publishes 33 national and regional magazines and newspapers, including *The American Lawyer*, the *New York Law Journal*, *Corporate Counsel*, *The National Law Journal*, *The Legal Intelligencer*, *Legal Times* and *Real Estate Forum*.

Tex as Attorney Files \$100 Million Lawsuit Against Critic, Ethics Grievant <https://www.law.com/texaslawyer/2018/04/02/tex-as-attorney-files-100-mi...>

Texas Attorney Files \$100 Million Lawsuit Against Critic, Ethics Grievant

John Council



Attorney Jason Van Dyke.

A Denton attorney is seeking \$100 million in damages from a critic who filed a grievance against him with the State Bar of Texas and, he claims, got him fired from a Plano law firm after accusing him in internet posts of being a "Nazi" and a "white supremacist."

Jason Van Dyke filed the suit in a Denton County state district court seeking damages against Thomas Christopher Retzlaff, who last year filed a complaint against the attorney with State Bar. Retzlaff, however, denies making the internet posts Van Dyke raises in his suit.

Van Dyke first made news last April for filing an unusual lawsuit against then-Victoria County District Attorney Stephen B. Tyler after Tyler rescinded a prosecutor job offer to Van Dyke. Van Dyke filed that lawsuit to force an explanation from the then-DA.

ADVERTISEMENT

And in November, Van Dyke made news again after he was suspended from Twitter for allegedly posting racist threats, prompting a Twitter war with New York rapper Talib Kweli, who in response published Van Dyke's personal information.

1 of 3

02-Apr-18, 4:35 PM

In his recent lawsuit, Van Dyke alleges Retzlaff filed a frivolous grievance against him with the State Bar, alleging that Retzlaff contacted the Victoria D.A. last year and said, "Do not hire this dude—he is a flipping lunatic".

The grievance also said Van Dyke regularly gets into flame wars with random people on the internet.

"Van Dyke has since been posting online that he is going to murder me because I am the one who cost him his job with Victoria County," Retzlaff's grievance stated, according to Van Dyke's lawsuit. "He further threatens to murder my family, and many others. Unfortunately for Van Dyke, he has come up against a person who simply cannot be intimidated. You all need to disbar this retard ASAP."

Van Dyke's lawsuit notes that the State Bar initially dismissed Retzlaff's complaint, but the Board of Disciplinary Appeals reversed the dismissal last month. A State Bar spokeswoman declined to comment on the status of the complaint against Van Dyke.

Van Dyke alleges in his lawsuit that the statements Retzlaff made against him in the grievance were false. "Plaintiff is not suing defendant for the act of filing the grievance. However he is suing defendant in part for the allegations made by him in the grievance and for tortious conduct that he has committed against the plaintiff since filing the grievance," Van Dyke wrote in his lawsuit.

Van Dyke also alleges that Retzlaff, whom he described in the lawsuit as a convicted felon and vexatious litigant, had posted on a website, "BV Files," that Van Dyke was a "Nazi" and "white supremacist," among other things. Van Dyke further alleges that Retzlaff posted pictures of the principals of the law firm where he worked—Plano's Karlseng, LeBlanc & Rich—specifically referring to principal Robert Karlseng as a "Nazi Paymaster" in another website posting.

"Getting caught in the crossfire of a cyber war is no fun," Karlseng, asked for comment, said. "Our firm does not tolerate discrimination in any way."

Van Dyke alleges he was ultimately fired from the law firm on March 27 because of the postings made by Retzlaff and contends that "but for the harassment of KLR and its principals by defendant, plaintiff would not have lost his job."

Van Dyke filed the lawsuit against Retzlaff the day following his termination, according to the complaint.

Van Dyke's lawsuit also levels claims against Retzlaff for libel, intrusion on seclusion, and two tortious interference with a contract claims based on the jobs he lost. He is seeking \$30 million in damages for mental anguish and loss of his professional reputation, another \$70 million for exemplary damages, and a temporary restraining order to prevent further defamation.

Van Dyke declined to comment on his lawsuit.

Retzlaff—who is pro se, and said he is retired and splits his time between Scottsdale, Arizona, and San Antonio—denied he posted anything negative about Van Dyke on the internet. Retzlaff confirmed that he does have a felony conviction for a gun

charge, is no stranger to the court system, and that he intends to file a motion to dismiss Van Dyke's complaint under Texas' Anti-SLAPP statute, which allows courts to quickly throw out claims against defendant who speak out on matters of public concern.

"He is claiming \$100 million in damages. That is the very definition of a SLAPP lawsuit. That was based on my complaint to the State Bar," Retzlaff said of Van Dyke's lawsuit. "I have a right to petition the government. I have a right to write to the State Bar."

Retzlaff said lawyers like Van Dyke should expect pushback from the public when they make threatening controversial comments and post them on the internet.

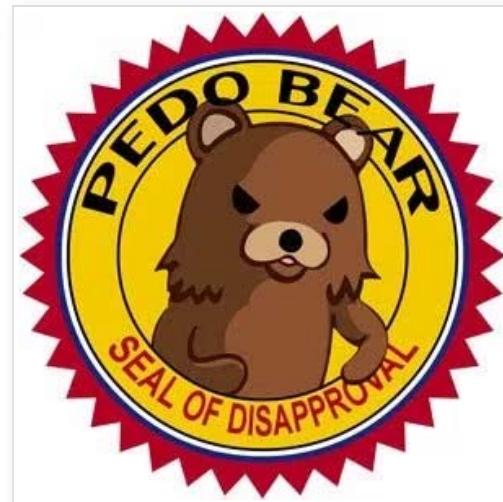
"The only person he could be mad at is himself," Retzlaff said of Van Dyke. "It's been said that we're often the author of our own misery."

3 of 3

02-Apr-18, 4:35 PM

<https://www.law.com/texaslawyer/2018/04/02/texas-attorney-files-100-million-lawsuit-against-critic-who-called-him-a-nazi/>

Hey Van Dyke – how's that restraining order working out for ya, bitch?



Below is the court document in which Van Dyke is identified as a possible pedophile because "he has that look about him."

FILED: 4/2/2018 8:01 AM
SHERRI ADELSTEIN
Denton County District Clerk
By: Elizabeth Jones, Deputy

FILE: This is considered Ex Parte Communication and will not be given to the Judge.

Judge Jonathan Bailey
431st District Court
Denton County Courts Building
1450 East McKinney Street 2nd Floor
Denton, Texas 76209-4524

March 30, 2018

Re: Jason L. Van Dyke v. Thomas Retzlaff
Case # 18-2793-431

Dear Judge Bailey,

According to *Twitter*, Jason Van Dyke is claiming that you have signed some kind of restraining order against me. I look forward to reading the reporter's record from the hearing to see exactly how it is that all this supposedly happened. And his \$100 million lawsuit against me, too!

This letter does not constitute in any way, shape, or form an "Answer" to Van Dyke's claims or my submission to your "jurisdiction". As you know, a defendant can correspond with the court without waiving the special appearance or the motion to transfer venue. **I have not been served with anything.** All I am going by is what some random persons have posted on *The Internet*. I am just worried that a lunatic might have gotten ahold of your rubber stamp, Judge Bailey, and did something stupidly crazy (not to mention unconstitutional!).

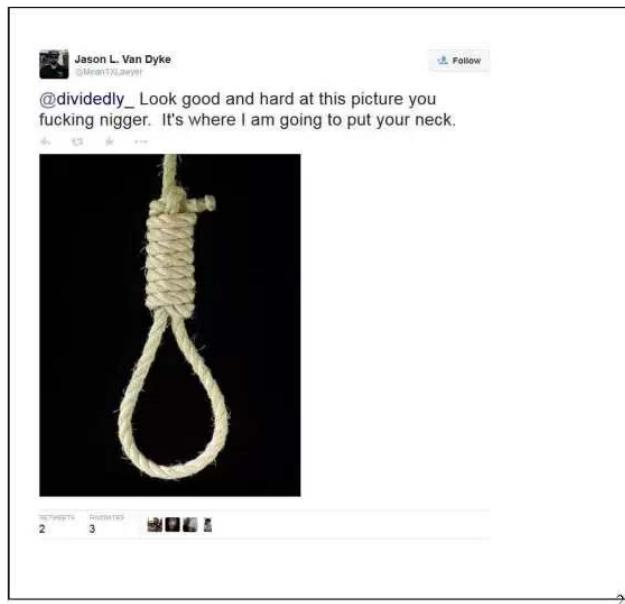
As you are no doubt aware, the United States Supreme Court has repeatedly held that the right to boycott, the right to contact businesses and

1

the employers of racists fucks (such as Van Dyke), is Constitutionally protected. *NAACP v. Claiborne Hardware Co.*, 458 U.S. 886 (1982), *Organization for a Better Austin v. Keefe*, 402 U.S. 415 (1971).

Thus, I am concerned that the lunatic who got ahold of your rubber stamp fails to comprehend such basic legal concepts as *prior restraint*.

In any event, Jason Lee Van Dyke is a Nazi, racist piece of human shit who has absolutely no business being a lawyer.



Now Judge Baily, I understand that you are very good friends with Van Dyke and you probably wanna help your buddy out. But do you really think that is a good idea? If word gets out that you are buddies with a racist Nazi, and are signing **BULLSHIT** *ex parte* orders on his behalf, what will the public think?



→ (No doubt Van Dyke is a pedophile, too. He has that “look” about him.) ←

As you know by now, Judge Bailey, Texas State Bar President Tom Vick has just issued a public statement to *Huffington Post* Senior Reporter Andy Campbell condemning Van Dyke in the strongest possible terms. You can read the article right here:

https://www.huffingtonpost.com/entry/lawyer-anti-fascist-lawsuit_us_5a0aefbee4b0b17ffce028fe



Texas Nazi Attorney Jason Van Dyke is Also a Pedophile - Court Records claim PDF File

Van Dyke will face a disbarment tribunal in Dallas for violating Disc.

Rules of Prof. Conduct, Rules(s) 4.04 (a); 4.04 (b); 8.04 (a)(2); 8.04 (a)(4).

As you know, Rule 4.04 deals with Respect for Rights of Third Persons. Calling people niggers and faggots and threatening to murder them is hardly respectful to 3rd parties, wouldn't you agree? Especially when he does this to opposing parties in ongoing lawsuits!

Rule 8.04(a)(2) prohibits a lawyer from committing a serious crime or commit any other criminal act that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects. While 8.04(a)(4) deals with engaging in conduct constituting obstruction of justice.

By the way, when you are pending a disbarment proceeding and facing the permanent revocation of your license to practice law, is it really a good idea to send the complainant a series of emails **from your official law firm email account** saying:

1. You are a dead man.
2. You'd better have your Will made out – I'm coming for you.
3. See you this weekend with my rifle.
4. I can't wait to see your fat ass on the other end of my scope. Did you know that a 190 grain 300 Winchester Magnum round travels at approximately 2,800 feet per second?
5. lol – you are a dead man. enjoy it while it lasts!

And then to top it off by filing a lawsuit against me in your court
claiming \$100 million in damages that is clearly a SLAPP!!

Yeah, that's what this racist fuck did to me, Judge Bailey!

In any event, the purpose of my letter is not to point out the
ridiculously unconstitutional nature of whatever BS restraining order Van
Dyke might or might not have. Nor do I wish to point out how utterly
unenforceable any alleged TRO's from your Texas court are across state
lines in Arizona. And I most certainly do not want to argue how Van
Dyke's "personal jurisdictional" claims are complete **BULLSHIT** in light of
recent holdings from both the Texas Supreme Court and the U.S. Supreme
Court in recent internet cases.

No, sir. I will save those arguments for another date, before a better
judge.

But what I do want to ask (and the entire point of this letter) is:

**What are your procedures for the filing of a motion to have the
Nazi, racist pedophile piece of human garbage that is Jason Lee Van
Dyke declared a Vexatious Litigant pursuant to Texas Civil Practice &
Remedies Code chapter 11?**

I ask because a very close and personal friend of mine (who is an actual lawyer for a very prestigious law firm) has found out and documented that Van Dyke has, in the seven-year period immediately preceding today, commenced, prosecuted, or maintained at least five litigations as a *pro se* litigant (other than in a small claims court) that have been finally determined adversely to Van Dyke. See Tex. Civ. Prac. & Rem. Code § 11.054(1).

Wow!

So should I ever get properly served with this lawsuit, one of the very first things that I will be filing is a motion to declare Van Dyke a vexatious litigant. And once that is out of the way, all of this **BULLSHIT** will get immediately removed to the federal court in Sherman.

Respectfully submitted,



Thomas Retzlaff
2402 E. Esplanade Ln.
PO Box 46424
Phoenix, AZ 85063-6424

email: Retzlaff@texas.net
Ph# (210) 317-9800

7

Van Dyke used to run a website called **The Potatoe.com** [sic]. This is the profile of himself he posted there on April 22, 2002.

My Profile

Name: Jason Lee Van Dyke
 Nicknames: Tex, Doc-J
 Location: Dallas, Texas
 Hometown: Troy, Michigan
 Date of Birth: XXXXXXXXXX
 School: University of Dallas
 Major: Politics (Pre-Law)
 Year In School: Junior

Religion: Nondenominational Christian

Politics: Republican

Voted for: George W. Bush

Other Political Affiliations: National Rifle Association

Favorite Political Quote: "...from my cold dead hands...." -- Charlton Heston

Occupation: Former Publisher of The Spartan Spectator, Owner of ThePotatoe.Com, President/CEO of New Conservative Union, Owner of MarxWatch.Com, Editor-in-Chief of Justice, Managing Editor of Patriot Magazine (coming soon).

Sports: Paintball, Bull Riding, Shooting, Judo

Fav. Beverage: Dr. Pepper

Fav. Alcoholic Beverage: Glenfiddish Single Malt Scotch

Fav. Foods: Rare Steak, Nachos, Buffalo Wings

Fav. Smoke: Dublin blend tobacco in a comco pipe

Fav. Musical Groups: David Allan Coe, Hank Williams Jr., Johnny Cash, Pat Green, Trick Pony, Merle Haggard, George Strait, Robert Earl Keen, Cory Morrow, Ted Nugent, and Alabama.

Fav. Movies: The Life and Times of Judge Roy Bean, Rooster Cogburn, True Grit, Patton, and The Good, The Bad, and The Ugly. Heroes: Ronald Reagan, John Wayne, Charlton Heston, Judge Roy Bean, Gen. George S. Patton Jr.

Ideal Woman: Any slender, fair-skinned, full breasted blonde that does what she's told.

Fav. Websites: ThePotatoe.Com, MarxWatch.Com

Fav. Websites Other Than My Own: drudgereport.com, villanovathines.com, crosscircuit.com, romp.com

Law School Prospects: U of Texas-Austin, U of Houston, Baylor

Future Job: US Attorney, County Prosecutor, Congressman, or President of the NRA.

Fav. Pro Sports Teams: Miami Dolphins, Dallas Cowboys, Houston Texans (soon), Arizona Diamondbacks, San Antonio Spurs, and the Detroit Red Wings

Fav. Author: Richard Marcinko

Fav. Places to Play Paintball: Futureball in Whitmore Lake, MI and Official Paintball Games of Texas in Forney, TX
 Paintball Equipment of Choice:

Paintball Gun: Wildside Custom Autococker

Barrel: Smart Parts Freak Barrel System

Eye Protection: JT LZE System

Harness: Mantis Pro pack

Pods: DYE 140rd Pods

Hopper: VL Revolution 12volt w/ Xboard

Air Supply: Paintball Mania 68cubic 4500psi Microreg

Padding: All by JT

Uniform: Animal Paintball pants and the jersey of my team

Fav. Place for Martial Arts: Anywhere there is a fight

Personal Quote: Always take the offensive - never dig in.

– <https://web.archive.org/web/20020422132011/http://www.thepotatoe.com/jvandyke/me.htm>

So is Jason Van Dyke a Nazi or a white supremacist? **Here is his profile on Storm Front.**

WNLaw
Forum Member
Join Date: Apr 2011
Location: Texas
Posts: 238

Re: Handsome Men

1. My name is Jason. I am 32, 6'1" and 210 lbs. Green eyes. Short dark brown hair. No facial hair. I am 25% each of Danish, German, English, and Dutch.
2. I would love to get married and have children of my own with a woman willing to spend the rest of her life with me in Texas. I have had little success in dating in the past and am willing to try again.
3. Roman Catholic
4. I have never been married and have no children.
5. I am a lawyer by trade and also interested in competitive shooting and mixed martial arts. I am a homebrewer (I make my own beer) and I enjoy riding motorcycles (Harley Fat Bob). I prefer vacations to beach resorts but also know how to ski and snowboard.
6. I want a woman who is smart, fun, and who has similar interests as me. I certainly want a woman who wants to have children and raise them in a traditional white household - but someone who also has a sense of adventure. Since my profession puts limitations on me, I need someone willing to stay in North Texas or relocate.
7. I don't know how "interesting" this is but instead of not working when I eventually retire I want to pursue business ventures I enjoy. I don't enjoy being a lawyer and would rather start up a martial arts gym, a gun store, a shooting range, or perhaps all three.

On March 16, 2017, Van Dyke was hired as an Assistant District Attorney in Victoria County, Texas.



Stephen B. Tyler
CRIMINAL DISTRICT ATTORNEY
205 N. BRIDGE STREET SUITE #301
VICTORIA, TEXAS 77901
Phone: (361) 575-0468
Fax: (361) 576-4139



16 March 2017

Please be advised, that Attorney Jason L. Van Dyke has accepted a position with the Victoria County Criminal District Attorney's office. His effective date of employment is 04/03/2017 and beginning salary is \$63,600.00. Please do not hesitate to call my office if you need any further information. Thank you.


E.H. "Ernie" Gutierrez Jr.
VCCDA Office Manager
205 N. Bridge St. Suite 301
Victoria, TX 77901
(361) 575-0468
egutierrez@vctx.org



Page 34 of 36

But then, *Some Random Person We've Never Heard Of Before* got wind of this hiring during a casual conversation with an old Army buddy of his from back in the day at a AUSA meeting in San Antonio and, just days later, Van Dyke found that the rug had just been pulled out from under him. **CHECK IT OUT!!**



Stephen B. Tyler
CRIMINAL DISTRICT ATTORNEY
205 N. BRIDGE, SUITE 301
VICTORIA, TEXAS 77901-8085
Phone: (361) 575-0468
Fax: (361) 576-4139



March 21, 2017

Jason Lee Van Dyke
200 Chisholm Place, #250
Plano, Texas 75075

RE: Victoria County Criminal District Attorney's Office, Felony Prosecutor

Dear Mr. Van Dyke:

During a recent telephone conversation on or about March 02, 2017, the Victoria County Criminal District Attorney's Office Manager, E. H. Guterrez, discussed with you potential employment with my office as a felony prosecutor to become effective on April 3, 2017. Further, you contacted Mr. Guterrez last week requesting a verification of employment with this office. Please be advised that my office will be unable to proceed as initially planned and cannot extend an offer for you to fill the vacant position of felony prosecutor at this time.

I regret any inconvenience that this may have caused you.

Sincerely,

A handwritten signature of Stephen B. Tyler in black ink.

Stephen B. Tyler
Criminal District Attorney
Victoria County

Page 36 of 36

FUN FACT: San Jose revenge porno perv James McGibney (who we don't like) likes to try to make fun of Retzlaff's military service by posting a bunch of false and defamatory garbage about him. But Retzlaff served honorably for over eight years as a U.S. Army Military Police Officer and as a Special Agent in the Criminal Investigation Command. **What did McGibney do?** He served two years in the US Marine Corps as an Admin Clerk in charge of arranging the training schedules at a school for Marines in Virginia. He got an Achievement Medal for 'taking over' and re-doing the class schedules during a rainy day when his boss called in sick. Seriously.



DEPARTMENT OF THE NAVY

THIS IS TO CERTIFY THAT
THE SECRETARY OF THE NAVY HAS AWARDED THE

NAVY AND MARINE CORPS ACHIEVEMENT MEDAL

TO

CORPORAL JAMES A. MCGIBNEY
UNITED STATES MARINE CORPS

FOR

PROFESSIONAL ACHIEVEMENT WHILE SERVING AS OPERATIONS CHIEF, MARINE SECURITY GUARD SCHOOL, QUANTICO, VIRGINIA FROM JANUARY 1996 TO FEBRUARY 1996. DURING THIS PERIOD, CORPORAL MCGIBNEY PERFORMED ALL DUTIES IN AN EXEMPLARY MANNER WHILE ASSIGNED TO A GUNNERY SERGEANT'S BILLET REQUIRING SUPERIOR ORGANIZATIONAL, MANAGEMENT, LEADERSHIP AND PROBLEM SOLVING SKILLS. CORPORAL MCGIBNEY DEMONSTRATED ALL OF THESE QUALITIES IN THE PERFORMANCE OF HIS DUTIES. IN ADDITION, WEATHER CONDITIONS DURING CLASS 294-96 WERE UNUSUALLY CHALLENGING, DUE TO THE SEVERE WINTER WEATHER AND THE MARSHAL CONDITIONS. ON SEVERAL OF THESE SPECIAL OCCASIONS, OPERATING UNDER THESE CONDITIONS WOULD HAVE BEEN CHALLENGING TO EVEN AN EXPERIENCED SNCO. CORPORAL MCGIBNEY'S ABILITIES AND DEVOTION TO DUTY RESULTED IN NO MISSED TRAINING TIME OR LOSS OF TRAINING FOR CLASS 2-96. CORPORAL MCGIBNEY'S SUPERIOR PERFORMANCE AND DEDICATION TO DUTY REFLECTED GREAT CREDIT UPON HIMSELF AND WAS IN KEEPING WITH THE HIGHEST TRADITIONS OF THE MARINE CORPS AND THE UNITED STATES NAVAL SERVICE.

GIVEN THIS 21ST DAY OF JUNE 1996



[Signature]
M. T. GOODMAN
COLONEL, U.S. MARINE CORPS
COMMANDING OFFICER,
MARINE SECURITY GUARD BATTALION

In any event, the Association of the U.S. Army (AUSA) is a non-profit organization that acts primarily as an advocacy group for the United States Army. Founded in 1950, it has 121 chapters worldwide. The San Antonio chapter is one of the largest.



– Stephen Tyler, Victoria County District Attorney

FUN FACT: Stephen Tyler spent more than a decade on active duty in the U.S. Army Airborne Rangers, reaching the rank of major while serving in reserve duty. He is a member of the AUSA – San Antonio Chapter.

Unfortunately for Van Dyke, Mr. Tyler does not like Nazis or racists. Thus, just five days after getting the job of Assistant District Attorney, Van Dyke lost the job of Assistant District Attorney.

Dead Kennedys - Nazi Punks fuck off



After Van Dyke lost his job with the Victoria County DA's Office, he went to work for Maverick Title of Texas, LLC D/B/A Texas Title Company, which is owned by the Plano, Texas law firm of Karlseng, LeBlanc & Rich.



But once they found out that they had a Nazi / white supremacist on the payroll, they did the right thing and fired his sorry ass ASAP!

3/23/2018 10:27 AM
 Chris Daniel - District Clerk Harris County
 Envelope No 23544449
 By: KATINA WILLIAMS
 Filed: 4/2/2018 12:00 AM

CAUSE NO. 201808740A

MAVERICK TITLE OF TEXAS, L.L.C., d/b/a	§	IN THE DISTRICT COURT
TEXAS TITLE	§	
Plaintiff,	§	
	§	152nd JUDICIAL DISTRICT
v.	§	
FROST BANK	§	
Garnishee	§	HARRIS COUNTY, TEXAS

**JASON LEE VAN DYKE'S VERIFIED MOTION
 TO WITHDRAW AS COUNSEL**

Jason Lee Van Dyke ("Movant") asks this Court to allow him to withdraw as attorney for Maverick Title of Texas L.L.C. d/b/a Texas Title. As grounds therefore, Movant states as follows:

A. FACTS

1. Movant has been continuously stalked by a Thomas Christopher Retzlaff a/k/a Dean Anderson, a convicted felon and vexatious litigant, since approximately December 20, 2017.
2. On or around March 25, 2018, Mr. Retzlaff extended his stalking behavior to Movant's clients, including Plaintiff and its principals. Movant was discharged by Plaintiff's principal, Robert Karlseng, on March 27, 2018 as a result of Mr. Retzlaff's behavior.

B. ARGUMENT

3. There is good cause, as required by Texas Rule of Civil Procedure 10, for this Court to grant the motion to withdraw. Movant has been discharged and his withdrawal from further representing Plaintiff in this case is mandatory under the Texas Disciplinary

Rules of Professional Conduct.

4. Plaintiff has been delivered a copy of this motion and notified of its right to object. Movant has also returned to Plaintiff its entire case file. Plaintiff's last known address is 5412 W. Plano Parkway, #101, Plano, TX 75093.
5. There are not currently any deadlines in this cause.

C. PRAYER

6. For these reasons, Jason Lee Van Dykes asks this Court to grant his motion to withdraw as counsel for Maverick Title of Texas L.L.C.

Respectfully submitted,

/s/ Jason Lee Van Dyke
Jason L. Van Dyke
Bar No. 24057426
108 Durango Drive
Crossroads, TX 76227
P – (469) 964-5346
F – (972) 421-1830
Email: jason@vandykelawfirm.com

MOTION TO WITHDRAW

Page 2 of 3

VERIFICATION

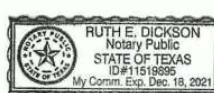
BEFORE ME, the undersigned authority, on this day personally appeared Jason Lee Van Dyke, who being by me duly sworn, upon oath deposes and says:

"My name is Jason Lee Van Dyke. I have read the above motion to withdraw as counsel and it is all true and correct to the best of my knowledge."



Jason L. Van Dyke

SUBSCRIBED AND SWORN before me on March 30, 2018.



Notary Public
State of Texas**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing, was sent to the following parties by electronic delivery pursuant to Rule 21a of the Texas Rules of Civil Procedure prior to 5:00 p.m. local time on March 30, 2018.

/s/ Jason Lee Van Dyke
JASON L. VAN DYKE

MOTION TO WITHDRAW

Page 3 of 3

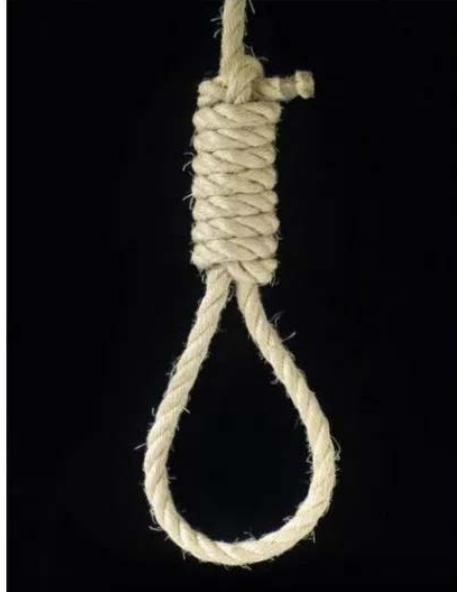
Van Dyke also got fired in the other two cases he was handling for Texas Title Company:

1. Case # 201808740 – Maverick Title of Texas vs. Superior Realty Invest.
2. Case # 201724312 – Maverick Title of Texas vs. Kavac Holding Co.

 Jason L. Van Dyke
@MeanTXLawyer

[Follow](#)

@dividedly_ Look good and hard at this picture you fucking nigger. It's where I am going to put your neck.



RETWEETS 2 FAVORITES 3

— Very recent tweet from attorney Jason Van Dyke

Unfortunately for Van Dyke, he got thrown under the bus of Political Correctness at the first opportunity:

“Getting caught in the crossfire of a cyber war is no fun. Our firm does not tolerate discrimination in any way.”

— Bob Karlseng, owner


[Follow](#)

@dividedly_ I don't waste my breath on niggers like you.
I hang them.

3:21 PM - 29 Dec 2014

Yeah, we are sure that Van Dyke will get a glowing Letter of Recommendation from Bob Karlseng.

In an effort at promoting some peace and harmony, our *American Hero & Honorary Admin of the BV Files* sent Van Dyke an offer of settlement. **CHECK IT OUT!!**

FILED: 4/3/2018 1:07 PM
SHERRI ADELSTEIN
Denton County District Clerk
By: Jennifer Stout, Deputy

Jason Van Dyke
108 Durango Drive
Aubrey, Texas 76227

April 3, 2018

Re: SETTLEMENT OFFER
Jason L. Van Dyke v. Thomas Retzlaff
Case # 18-2793-431

Van Dyke,

I wish to make the following offer to you in full settlement for each and every one of your claims against me, now and forever:

You pay me \$75,000 and I promise that I won't spend the next 20 years dragging your sorry ass through a debtor's examination whenever I get bored on account of the massive anti-SLAPP sanctions and attorney's fees award I shall be getting shortly in this case.

If you had taken but a moment to research me at all, you would have quickly learned what happened to the last guy who filed a SLAPP lawsuit against me in Texas – **he got hit with a judgment for over \$1.3 million.**

You claimed in your pleadings that you spoke to Evan Stone about me. Clearly you either did not pay attention to what he said or, (more likely) he simply choose not to warn you to flee and save your life because Stone (a flaming liberal) wants to see you get messed up. Funny how betrayal works, eh, tough guy?

1

You were a fool for thinking for even an instant that you were qualified to serve as an assistant district attorney and for believing that your past would never catch up with you.

You wanna blame someone for losing your job, your career, and everything else? **Look in the mirror!**

The assistant police chief of Estherwood, Louisiana, Wayne Welsh, was recently forced to resign in disgrace after a racist Facebook post became public knowledge. His firing is one of many related to racist texts or emails from law enforcement officers and public officials, as communities across America try to get a handle on racism in their ranks. (As evidenced by a quick Google search.)

YOU belong to a racist group that many people would closely identify as being of fascist or Nazi ideology – *The Proud Boys*. (Isn’t that what your Ford truck’s license plate says, *PRDBOY*?) Those aren’t my words – they are the words of news organizations and groups such as the Southern Poverty Law Center:

<https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>

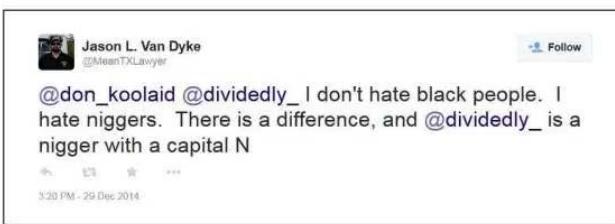
Note that I am not disagreeing with you or your political position, you shithead. My beef with you is that you don’t get to have a Bar Card – and you don’t get to be an Asst. DA – if you are also going to run around calling

people niggers and faggots, and making death threats to opposing parties and opposing counsel as a way of trying to gain an unfair advantage.

There are too many stories of convictions obtained through subornation of perjury, through suppression of exculpatory evidence, and through the willful use of unreliable, wrongfully obtained confessions. Too many stories of people like John Bradley, John Jackson, Charles Sebesta, Susan Reed, Abel Reyna, and Nico Lahood, who become “public servants” who abuse their positions and screw people over.

You think it was an accident that seven of 13 sitting Texas district attorneys who faced 2018 primary challengers lost their races????

Van Dyke – what did you think would happen as soon as some defense attorney, any defense attorney, saw this shit that you posted on Twitter?



Jason L. Van Dyke
@MeanTXLawyer

@don_koolaid @dividedly_ I don't hate black people. I hate niggers. There is a difference, and @dividedly_ is a nigger with a capital N

328 likes · 3:28 PM - 29 Dec 2014

You don't think that this would ever come up in any case you tried to prosecute that involved a minority?

Yesterday's article in Texas Lawyer is only just the beginning, dude, as I am just getting warmed up.

<https://www.law.com/texaslawyer/2018/04/02/texas-attorney-files-100-million-lawsuit-against-critic-who-called-him-a-nazi/?slreturn=20180303040120>

So you can pay me now or suffer the consequences with an anti-SLAPP motion. **I want \$75,000 for your violating the Texas Citizens Participation Act.**

By the way, how's that restraining order working out for you that Judge Bailey signed? Have all the "mean people" on *The Internet* stopped talking about you and contacting your past, present, and future clients / employers? Too bad TROs only work on people who have been personally served and who actually give a shit (neither of which applies to me).

Lastly, you claim to have gotten fired by Robert Karlseng, yet you are still using his address of 5412 W. Plano Parkway, #101, Plano, TX 75093 in the pleadings you have filed in this case. Clearly you (or Karlseng) are lying when you / he claim your employment was terminated.

Oh, and FYI: Benjamin Nessia sends his regards. You remember him, don't you? And how many felony and misdemeanor criminal charges were you hit with as a result of what you did to him and that girl??

Now I suggest you contact your liability / malpractice insurance carrier before things get even more worse for you and let them know that I am formally making a claim against you.

Respectfully submitted,



Thomas Retzlaff
2402 E. Esplanade Ln.
PO Box 46424
Phoenix, AZ 85063-6424

email: Retzlaff@texas.net
Ph# (210) 317-9800

5

According to sources close to the investigation, (which consist solely of the voices in our head), someone with deep and unfettered access to *Lexis Nexis Accurint for Law Enforcement Officers* caught wind that Van Dyke was the suspect of a recent assault involving serious bodily injury!

Specifically, according to *Some Random Person We've Never Heard Of Before*:

"Van Dyke was questioned as a suspect for Assault with Bodily Injury, a Class A misdemeanor in Texas, regarding a July 14, 2017, 11:21 pm, fight at a Denton, TX bar called Lucky Lou's Bar & Tavern, which is on Hickory Street. The victim was transported to a local hospital, unconscious, with head injuries. Van Dyke had a knife on him at the time. The case was referred for prosecution by the Denton PD, but the district attorney declined since it appears that the other guy might have started it by calling Van Dyke a "fascist pig" and allegedly spitting on him. Van Dyke was wearing his "West is Best" hat and a Donald Trump shirt.

While no charges were filed, Van Dyke has been banned by the bar."

This is quite interesting, especially in light of the FACT that Van Dyke was arrested on charges of domestic violence and illegal weapons offenses while a student at Michigan State University on November 15, 2000. Van Dyke was held on a \$10,000 bond and prosecuted.

Furthermore, once the judge, the Hon. David L. Jordan, found out that Van Dyke was stalking and threatening to MURDER fellow student Benjamin Nessia, the judge REVOKED Van Dyke's bond and ordered him held in custody pending disposition.

FUN FACT: Stuart Dunnings III served for 19 years as the prosecutor for Ingham County (East Lansing) Michigan, and was the first African-American to be elected to such office in Michigan. During his time in office, Dunnings built a reputation of cracking down especially hard on prostitution, sexual assault, domestic abuse, and sex trafficking.

Unfortunately for Dunnings, he was recently arrested and sent to FEDERAL PRISON for charges involving prostitution, sexual assault, domestic abuse, and sex trafficking.

After reading through countless pages of police reports, records from Michigan State University, and court records, we cannot help but come to the conclusion that Jason Lee Van Dyke is a homosexual (not that there's anything wrong with it!).

He is, after all, 38 years old, never been married, has no children, and lives with his 71 year old father in a very small house. Plus, he puts strange men's penises in his mouth.



Or you can just ask this guy here...



– Yeah, this guy does not look like a total fag, right?

Attorney Evan Stone of Denton, Texas, was kind enough to give Van Dyke some advice before he filed his LOLsuit against Retzlaff. Clearly, he was given very good advice, eh?

BONUS FUN FACT: Van Dyke was expelled from high school for having a knife and threatening to stab a fellow student. Which makes this photo here especially funny!



CurseYouJeffBezosHat

@Popehat

Follow

Noted Proud Boy Jason L. Van Dyke continues to refuse to apologize for his role in creating the modern world.



4:39 PM - 27 Mar 2018

16 Retweets 154 Likes



24 16 154



– One of Retzlaff's pure breed, pure white German Shephards sitting in his car.

Anyways, it is late (at least here in Southern California). Further updates will be posted throughout the weekend. So keep coming back for more!!



UPDATE: APRIL 10, 2018

Van Dyke's LOLsuit has just been removed to federal court.

Case 4:18-cv-00247-ALM-CAN Document 2 Filed 04/10/18 Page 1 of 1 PageID #: 80

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS

NOTICE OF CASE ASSIGNMENT

Judge Mazzant

CAUSE STYLE:

CAUSE NO:

Van Dyke

4:18cv247-ALM-CAN

v.

Retzlaff

This is to advise you that the above cause has been filed/transferred and bears the above case number and style. All future instruments should be referred to by this number and filed with the appropriate divisional office of the Eastern District of Texas.

You are further advised that this case has been assigned to the above named judge.

Date: April 10, 2018

Case 4:18-cv-00247-ALM-CAN Document 2-1 Filed 04/10/18 Page 1 of 1 PageID #: 81

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS

MAGISTRATE REFERRAL

CIVIL ACTION NO. 4:18cv247

Van Dyke
v.
Retzlaff

Pursuant to a Standing Order, certain civil suits are referred at the time of the filing equally among magistrate judges. Therefore, the above-entitled action has been referred to:

Magistrate Judge Nowak



— Magistrate Judge Christine A. Nowak

Does anyone here think that Christine is a big fan of Nazi's or drug addicted crazy people who file \$100 million LOLsuits? **STAY TUNED FOR MORE UPDATES!!**



UPDATE: April 15, 2018:

In response to several grievances filed against Jason Van Dyke – to include one filed by our close and personal friend, Ken White of the Los Angeles law firm of Brown, *White & Osborn LLP* – who is a fellow blogger on [the Pope Hat blog](#) – along with the grievance filed by *American Hero & Honorary Admin of the BV Files* Thomas Retzlaff, Van Dyke has hired an attorney to represent him in the upcoming disbarment lawsuit.

WHO WOULD BE WILLING TO REPRESENT A NAZI / WHITE SUPREMIST WHO OPENLY ADVOCATES THE MURDER OF MINORITIES AND MEMBERS OF THE LBGT COMMUNITY?



Alan Kramer Taggart
 Attorney at Law
 Dallas/Fort Worth Area | Law Practice

Current: The Law Offices of Alan Kramer Taggart
 Previous: C Company/ 3rd Battalion Mechanised Infantry
 TxANG, Dallas County Public Defenders Office,
 IOBC 2-93
 Education: Texas Tech University

486 connections

Experience

Managing Attorney

The Law Offices of Alan Kramer Taggart
1994 – Present (24 years)

Lead attorney of a litigation group concentrating on the representation of individuals and small companies who have found that large law firms are not responsive to their needs and special circumstances. While concentrating on the defense of the wrongfully accused and matters relating to family and marriages, our flexibility allows us to successfully and at a reasonable cost meet many of the different legal challenges that face our clients in today's complex world.

Platoon Leader

C Company/ 3rd Battalion Mechanised Infantry TxANG
1993 – 1995 (2 years)

Tactical leadership, proficiency maintenance, and implementation of higher guidance of a reserve component mechanized infantry platoon, while maintaining security, accountability and readiness of personnel and mission essential equipment in order to meet and overcome enemies of the United States of America through the application of directed aggression and controlled violence.

Assistant Public Defender

Dallas County Public Defenders Office
1990 – 1994 (4 years)

Saving those who may have failed to live up to our Saviors perfection from those who thought they were perfect

So an attorney who who once took an oath to ***support and defend the Constitution of the United States against all enemies, foreign and domestic*** signs on to represent a white supremacist. Well, we guess that even accused Nazis need attorneys, too, right?

But did you, our teeming **MILLIONS** of readers, listeners, and supporters know that Taggart is also a **CONVICTED CRIMINAL**? Yes, he was arrested in May 2003 for the 3rd degree felony offense of Tampering with a Government Record, which he later pled out and was placed on probation.

So what kind of house does an attorney who represents white supremacists live in?



He also owns this house here, too:



A couple days ago, Van Dyke sent us the following email:

“Tom – From this point forward, any e-mails you send me will be forwarded to the police. I am filing a police report for harassment first thing in the morning. Do not contact me again.”

Van Dyke, of course, is a dumb ass for thinking that “Tom” lives here, despite the fact that it has been stated over and over that he does not. Nor do Lane Lipton, Jeffrey Dorrell, Lora Lusher, Layne Walker, Neal Rauhauser, Mark Sparks, Joe Fisher, Jr., or any of the other half

Your Admins at the *BV Files* responded as follows:

“I wish I was Tom, but I am not. But since when have you ever allowed reality to get in the way of your bizarre conspiracy theories.

Police reports for “harassing emails”?!! lol – bitch. But then again, I guess in your world sending people emails saying you have a rifle and are going to their home to shoot them is cool, eh? And sending people emails saying that you are going to strangle them for 3 minutes so they turn into a vegetable (a turnip, is what you said), is no big deal? And then you email saying ‘you are going to die, better make your will’ (or words to that effect), is “funny.”

Oh, and let us not forget ALL the dozens upon dozens of social media posts calling people niggers and faggots and telling folks how you are going to lynch them and murder their families – it's all good, right, bitch?

And what about the total fraud you committed upon the court when you filed that PinkMeth lawsuit and “served” it upon your buddy in racism Kyle Bristow at his law office in Michigan claiming that he was the Admin of PinkMeth and, thereby, securing a default judgment.

Do you honestly think that you will be able to withstand even a moment on the witness stand, in federal court, under oath, without your hand being burnt to a crisp once you place it upon the Bible?

bahahahahahahaha

Email harassment is only a Class B misdemeanor, in Texas, right? Good thing I do not even live in the United States, let alone Texas, dumb ass.

You seriously are a dumb piece of shit, Van Dyke. You started ALL of this bullshit by emailing death threats and posting outrageously offensive racial comments on Facebook and Twitter and now you expect everyone to just go away and leave you alone? Dude, you are going to remain unemployable for the rest of your life!

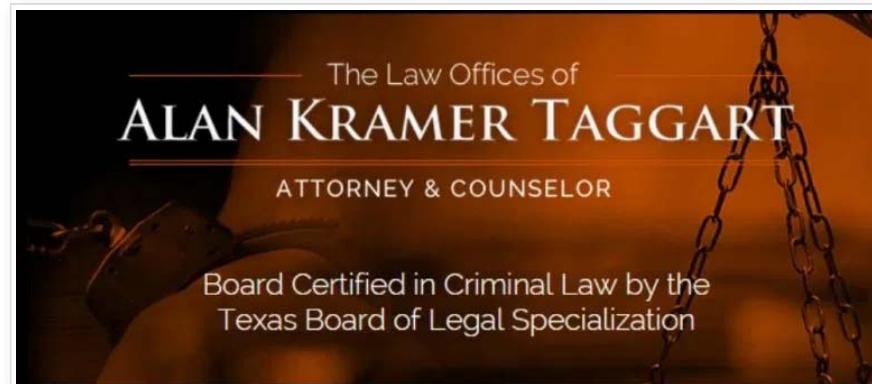
There is not a prosecutor in the world that will touch anything with your name on it, not a jury on the planet that would see you as a victim. You are a fucking criminal who lies under oath and commits fraud upon the court when it serves his SLAPP litigation, and who lied on his job application to the Victoria County DA. Now you are all butt-hurt because you got busted.

“Clean hands”, motherfucker, does not apply to you!

By the way, I just saw on Twitter that a very mean federal judge has been assigned to your case. Her track record on SLAPP cases is amazing! I predict wonderful things in your future. Seriously.

For a guy who has billed himself as “the meanest and most right-wing lawyer in Texas”, you really are quite a pussy. And I mean that in all sincerity.

Dean Anderson”





April 16, 2018: We, your Admins of the *BV Files*, made a mistake in an update we posted to this article yesterday in which we claimed that Van Dyke had started working for Texas Title Company several years ago on October 2013. It turns out that the online docket entry that we looked at did not fully tell the story and, as a result, we made a mistake and have since corrected and update this article.

Many thanks to a sharp-eyed reader who noticed the mistake and contacted us!! And if anyone else ever finds a mistake or thinks we left something out, please do not hesitate to contact us via the top of the website!

For years Jason Van Dyke and his "Proud Boys" have sought the spotlight. But Van Dyke needs to remember something very, very important: For a man in his position, the spotlight can turn into an interrogation lamp pretty damn fast!



Tweet